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July 16, 2021

**VIA ELEC. FILING**

Honorable Ann Marie Donio  
United States Magistrate Judge  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza  
Camden, New Jersey 08101

Re: Maurice Gordon, Sr., et al, v. Randall Wetzel, et al.  
Civ. No.: 21-cv-4861 (NLH-AMD)

Dear Judge Donio:

I represent Defendants Gurbir S. Grewal and Patrick J. Callahan in the above-captioned matter. As ordered by the Court on June 30, 2022, this letter is in response to Plaintiff's letter dated June 29, 2022, [Docket No. 133], regarding discovery.

In Attachments A and B, Plaintiffs sought production of documents reflective of the universe of misconduct allegations involving Defendant Wetzel and biannual reports required of the Office of Law Enforcement Professional Standards ("OLEPS"). Please note that Defendants produced documents responsive to misconduct allegations on June 29, 2022. Those documents are bates labeled EST GORDON 10674 - 11197. Also included with this production were State Police ballistics documents, additional performance evaluations for Defendant Wetzel, Shooting Response Team Investigative Reports and data generated during the course of the shooting investigation.

Defendants' response to Plaintiffs' demand for OLEPS biannual reports were also addressed in the June 29, 2022 letter. Plaintiff was informed that OLEPS documents were identified on a privilege log and withheld under the deliberative process and self-critical analysis privileges.



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Over the course of discovery in this case, Defendants have made productions on March 9, 2022, April 28, 2022, May 31, 2022, June 29, 2022, and June 30, 2022, totaling 11,717 documents and/or media files. Thus, Defendants have been responsive to their discovery obligations.

Please note that this office is reassigning this case to outside counsel. We expect the newly appointed counsel to enter an appearance in the near future.

Respectfully requested,

CHRISTOPHER A. EDWARDS  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: Marvin L. Freeman  
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cc: All counsel of record (via CM/ECF)